

219
5/20/83

ERTEC REVIEW OF BHS WAIVER
DEMONSTRATION

1.0 INTRODUCTION:

The only critical issue presented here is that the sandy zone (elevation 670 to 690) is considered to be the uppermost aquifer at the site. This may be subject to Regulatory interpretation, in that it is not clear that the "sandy zone" meets the definition of aquifer at §260.10.

"Aquifer" means a geologic formation, group of formations, or part of a formation capable of yielding a significant amount of ground water to wells or springs.

While BHS may attempt to dispute that the sand aquifer is the uppermost aquifer, it does not appear the results of the review would differ if the bedrock aquifer were considered to be the uppermost.

2.0 POTENTIAL FOR MIGRATION TO UPPERMOST AQUIFER:

2.1 General Remarks:

The review concludes that there definitely is a potential for hydraulic vertical movement from the facility to the sand aquifer and to the bedrock aquifer. There is also a potential for lateral movement from the facility to surface water. Estimated travel times are as follows:

Vertical movement from facility to the sand aquifer - 16 years to 410 years.

Vertical movement from the sand aquifer to the bedrock aquifer -
43 years to 430 years.

Lateral movement from facility to surface waters - 3 months to 2.6 years.

3.0 POLITICAL IMPLICATIONS OF REVIEW RESULTS:

1. State issued permit to BHS to operate hazardous waste landfill.
2. Facility has not had a groundwater monitoring system in accordance with subpart F in effect.
3. If waiver is denied it appears that state permit may not be legal.
4. The facility is opposed by active citizen's group.
5. It is the only hazardous waste landfill in Missouri.

4.0 CONCLUSION:

It appears the waiver request should be denied - that would mean facility in violation of GWM requirement from effective date until present.



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